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FILED

EH SEP 27 2016

Clerk, U.S. District Court
District Of Montana
Billings

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA, Plaintiff, vs. CHARLTON VICTOR CAMPBELL, and MICHAEL JAMES MASON, Defendants.	CR 16- 93 -BLG-SPW INDICTMENT CONSPIRACY TO MANUFACTURE AND DISTRIBUTE MARIHUANA (Counts I and II) Title 21 U.S.C. § 846 (Penalty for Count I: Mandatory minimum ten years to life imprisonment, \$10,000,000 fine, and at least five years supervised release) (Penalty for Count II: 20 years imprisonment, \$1,000,000 fine, and at least three years supervised release)
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	<p>POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA (Counts III & IV) Title 21 U.S.C. § 841(a)(1) (Penalty for Count III: Mandatory minimum ten years to life imprisonment, \$10,000,000 fine, and at least five years supervised release) (Penalty for Count IV: 20 years imprisonment, \$1,000,000 fine, and at least three years supervised release)</p> <p>FORFEITURE 21 U.S.C. § 853</p> <p>TITLE 21 PENALTIES MAY BE ENHANCED FOR PRIOR DRUG- RELATED FELONY CONVICTIONS</p>
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THE GRAND JURY CHARGES:

COUNT I

That beginning in approximately March of 2016 and continuing until on or about May 18, 2016, at Bozeman, and elsewhere in the State and District of Montana, the defendants, CHARLTON VICTOR CAMPBELL and MICHAEL JAMES MASON, knowingly and unlawfully conspired and agreed with other persons, both known and unknown to the Grand Jury, to manufacture and distribute, in violation of 21 U.S.C. § 841(a)(1), more than 1,000 marihuana plants, a Schedule I controlled substance, in violation of 21 U.S.C. § 846.

COUNT II

That beginning in approximately March of 2016 and continuing until on or

about May 18, 2016, at Bozeman, and elsewhere in the State and District of Montana, the defendants, CHARLTON VICTOR CAMPBELL and MICHAEL JAMES MASON, knowingly and unlawfully conspired and agreed with other persons, both known and unknown to the Grand Jury, to manufacture and distribute, in violation of 21 U.S.C. § 841(a)(1), marihuana in the form of butane hash oil, a Schedule I controlled substance, in violation of 21 U.S.C. § 846.

COUNT III

That beginning in approximately March of 2016 and continuing until on or about May 18, 2016, at Bozeman, in the State and District of Montana, the defendants, CHARLTON VICTOR CAMPBELL and MICHAEL JAMES MASON, knowingly possessed, with the intent to distribute, more than 1,000 marihuana plants, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT IV

That beginning in approximately March of 2016 and continuing until on or about May 18, 2016, at Bozeman, in the State and District of Montana, the defendants, CHARLTON VICTOR CAMPBELL and MICHAEL JAMES MASON, knowingly possessed, with the intent to distribute, marihuana in the form of butane hash oil, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

FORFEITURE ALLEGATION

1. The allegations contained in Counts I, II, III, and IV of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841 and 846, the defendants, CHARLTON VICTOR CAMPBELL and MICHAEL JAMES MASON, shall forfeit to the United States of America any property constituting and derived from any proceeds obtained, directly and indirectly, as the result of such offenses and any property used and intended to be used, in any manner or part, to commit and to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

A. PERSONAL PROPERTY

(1) Approximately \$30,000 in United States Currency.

B. REAL PROPERTY

(1) Commercial property located at 160 Zoot Way, Bozeman, Montana;

(2) Commercial property located at 160 A Zoot Way, Bozeman, Montana;

(3) Commercial property located at 160 B Zoot Way, Bozeman, Montana;

- (4) Commercial property located at 160 C Zoot Way, Bozeman, Montana;
- (5) Commercial property located at 152 Zoot Way, Bozeman, Montana; and
- (6) Commercial property located at 154 Zoot Way, Bozeman, Montana.

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

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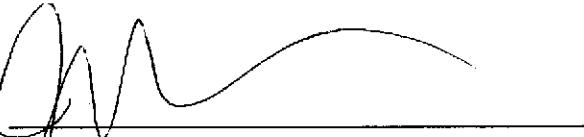
A TRUE BILL.

Foreperson signature redacted.

FOREPERSON


MICHAEL W. COTTER

United States Attorney


JOSEPH E. THAGGARD

Criminal Chief Assistant U.S. Attorney

Crim. Summons _____

Warrant: X - Both

Bail: _____